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Of Attorneys for Petitioner Liliana Mondragón Martinez

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

Portland Division

In re the Application of:

Case No.: 3:24-cv-00694-HZ

LILIANA JACQUELINE MONDRAGÓN
MARTINEZ,

Petitioner,

PETITIONER'S MOTION FOR
ATTORNEY FEES AND COSTS

and

OSCAR AURELIO VEGA CONTRERAS,

Respondent.

The Convention on the Civil Aspects of International Child Abduction
Done at the Hague on 25 Oct 1980
International Child Abduction Remedies Act, 22 USC § 9001 *et seq.*

COMES NOW, Petitioner Liliana Mondragón Martinez, by and through her attorneys of record, Katrina Seipel and Buckley Law, P.C., and moves this Court for an order, pursuant to FRCP 54, requiring Respondent to pay her attorney fees, in the amount of \$96,087.50, and costs, in the amount of \$12,257.65 incurred in the above titled proceeding. As set forth in Petitioner's supporting memorandum, Petitioner is entitled to an award of reasonable attorney fees and costs in this matter because she prevailed on her

Petition for Return of Child to Habitual Residence (Mexico). Petitioner additionally requests that the Court apply a multiplier of 2.0, granting her a money judgment in the total amount of \$204,432.65.

This Motion is supported by the following filings submitted herewith: 1) Memorandum of Law in Support of Petitioner's Motion for Attorney Fees and Costs, and 2) Declaration of Counsel in Support of Petitioner's Motion for Attorney Fees and Costs, as well as the records on file in this case.

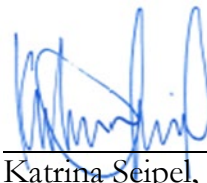
Respectfully submitted this 12th day of August, 2024.



Katrina Seipel, OSB #164793
Of Attorneys for Petitioner

CERTIFICATE OF SERVICE

I certify that this document was served, on August 12, 2024, by electronic service through the CM/ECF filing system and by e-mail, upon Kimberly S. Brown, at kbrown@pacificcascadefamilylaw.com.



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